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John Doe

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

John Doe,

Plaintiff,

v.

Donald J. TRUMP, in his official capacity,
President of the United States of America, et al.

Defendants.

Case Nos. 4:25-cv-03140-JSW

**DECLARATION OF JOHNNY
SINODIS IN SUPPORT OF
PLAINTIFFS'
CONSOLIDATED
SUPPLEMENTAL BRIEF**

Request for Declaratory and
Injunctive Relief

Judge: Hon. Jeffrey White
Hearing Date: May 13, 2025
Hearing Time: 9:00 a.m.

Zhuoer Chen, et al.,

Plaintiffs,

v.

Kristi NOEM, in her official capacity,
Secretary of the U.S. Department of Homeland
Security, et al.

Defendants.

Case Nos. 4:25-cv-03292-JSW

**DECLARATION OF JOHNNY
SINODIS IN SUPPORT OF
PLAINTIFFS'
SUPPLEMENTAL BRIEF**

Request for Declaratory and
Injunctive Relief

Judge: Hon. Jeffrey White
Hearing Date: May 13, 2025
Hearing Time: 9:00 a.m.

Doe v. Trump et al., No. 4:25-cv-03140-JSW
DECLARATION OF JOHNNY SINODIS

1 S.Y., et al.,

2 Plaintiffs,

3 v.

4 Kristi NOEM, in her official capacity,
5 Secretary of the U.S. Department of Homeland
6 Security, et al.

7 Defendants.

Case Nos. 4:25-cv-03244-JSW

**DECLARATION OF JOHNNY
SINODIS IN SUPPORT OF
PLAINTIFFS'
SUPPLEMENTAL BRIEF**

Request for Declaratory and
Injunctive Relief

Judge: Hon. Jeffrey White
Hearing Date: May 13, 2025
Hearing Time: 9:00 a.m.

10 J.C., et al.,

11 Plaintiffs,

12 v.

13 Kristi NOEM, in her official capacity,
14 Secretary of the U.S. Department of Homeland
15 Security, et al.

16 Defendants.

Case Nos. 4:25-cv-03502-JSW

**DECLARATION OF JOHNNY
SINODIS IN SUPPORT OF
PLAINTIFFS'
SUPPLEMENTAL BRIEF**

Request for Declaratory and
Injunctive Relief

Judge: Hon. Jeffrey White
Hearing Date: May 13, 2025
Hearing Time: 9:00 a.m.

19 Jungwon Kim, et al.,

20 Plaintiffs,

21 v.

22 Kristi NOEM, in her official capacity,
23 Secretary of the U.S. Department of Homeland
24 Security, et al.

25 Defendants.

Case Nos. 4:25-cv-03383-JSW

**DECLARATION OF JOHNNY
SINODIS IN SUPPORT OF
PLAINTIFFS'
SUPPLEMENTAL BRIEF**

Request for Declaratory and
Injunctive Relief

Judge: Hon. Jeffrey White
Hearing Date: May 13, 2025
Hearing Time: 9:00 a.m.

28 *Doe v. Trump et al.*, No. 4:25-cv-03140-JSW
DECLARATION OF JOHNNY SINODIS

Shangshang Wang, et al.,

Plaintiffs,

v.

Kristi NOEM, in her official capacity,
Secretary of the U.S. Department of Homeland
Security, et al.

Defendants.

Case Nos. 4:25-cv-03323-JSW

**DECLARATION OF JOHNNY
SINODIS IN SUPPORT OF
PLAINTIFFS'
SUPPLEMENTAL BRIEF**

Request for Declaratory and
Injunctive Relief

Judge: Hon. Jeffrey White
Hearing Date: May 13, 2025
Hearing Time: 9:00 a.m.

1 I, Johnny Sinodis, hereby declare as follows:

2 1. I am a partner at Van Der Hout LLP, which is located at 360 Post Street, Suite 800, San
3 Francisco, California 94108. I have personal knowledge of the matters stated herein because I
4 am Plaintiffs' attorney in the instant matter. I make this declaration in support of Plaintiffs in
5 the above-captioned cases' consolidated Supplemental Brief in Support of Motion for a
6 Preliminary Injunction.

7 2. Attached as Exhibit A is an email filed by the government in *Patel v. Lyons*, 1:25-cv-
8 01096-ACR (D.D.C.), on April 28, 2025, showing communication between the U.S.
9 Department of State (DOS) and the U.S. Department of Homeland Security (DHS) regarding
10 the mass termination of SEVIS records.

11 3. Additionally, several of the Plaintiffs in the above-captioned cases before this Court
12 have informed undersigned Counsel that their SEVIS records show a gap between the date of
13 unlawful termination and the date of reactivation by ICE, demonstrating that their SEVIS
14 records were not restored *nunc pro tunc*. To date, counsel has been informed of gaps in the
15 SEVIS records of the following Plaintiffs in case *J.C., et al. v. Noem et al.* (4:25-cv-03502-
16 JSW):

- 17 - A.B. – gap in SEVIS records from 4/8/2025 through 4/24/2025
- 18 - D.Y. – gap in SEVIS records from 4/5/2025 through 4/28/2025
- 19 - Y.Z. – gap in SEVIS from 4/4/2025 through 4/24/2025

20 I declare under penalty of perjury that the foregoing statement is true and correct to the best of
21 my own personal knowledge. Executed this 30th day of April 2025 at San Francisco, California.

22 /s/ Johnny Sinodis
23 Johnny Sinodis
24 Declarant
25
26
27
28

EXHIBIT A

From: [REDACTED]
To: [REDACTED]
Subject: FW: Draft Email for [REDACTED] to send to DHS: For DHS - Delta List by valid and no valid visa
Date: Wednesday, April 2, 2025 3:50:29 PM
Attachments: [For DHS - Delta List Valid and No Valid Visa.xlsx](#)

Please terminate all in SEVIS.

[REDACTED]
Division Chief
Homeland Security Investigations
National Security Division
Counterterrorism Division
Cell: [REDACTED]

From: [REDACTED]@state.gov>
Sent: Wednesday, April 2, 2025 3:35 PM
To: [REDACTED]@hsi.dhs.gov>; [REDACTED]
[REDACTED]@hsi.dhs.gov>
Cc: [REDACTED]@state.gov>; [REDACTED]@state.gov>;
[REDACTED]@state.gov>
Subject: FW: Draft Email for [REDACTED] to send to DHS: For DHS - Delta List by valid and no valid visa

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click [here](#) and follow instructions.

[REDACTED],

We've run the Delta data against our systems.

- The first tab lists individuals with valid visas – how would you like us to prioritize revocations of these visas? [REDACTED]
- The second tab is students without a valid visa. We request that DHS terminate SEVIS status for these individuals as there is no valid visas for us to revoke and they were admitted under duration of status.”

Regards,

[REDACTED]

SENSITIVE BUT UNCLASSIFIED